

MOTION SEEKING LEAVE TO WITHDRAW AS COUNSEL

Bruce A. Wagman of Riley Safer Holmes & Cancila LLP, pursuant to Local Rule 83-11(c), hereby seeks leave of Court to withdraw as counsel for Plaintiffs Central Oregon Wild Horse Coalition, Gayle Hunt, and Melinda Kestler (collectively “Plaintiffs”) in the above-captioned action, and in support of this motion states as follows:

1. Mr. Wagman moved for and was granted leave to appear pro hac vice in this action on October 26, 2021 (the “Order”). (ECF Nos. 8, 9).
2. On May 24, 2023, the Court granted Defendants’ Motion for Summary Judgment and denied Plaintiffs’ Motion for Summary Judgment. (ECF No. 40). Plaintiffs filed their Notice of Objection to the Order on June 9, 2023 (ECF No. 41) and the Court has ordered Defendants to file their Response by June 30, 2023.
3. Mr. Wagman and Riley Safer Holmes & Cancila LLP seek to withdraw as counsel to Plaintiffs in this action on the grounds that should Plaintiffs seek further relief, up to and including appeal, they would be better served by retaining other counsel.
4. Plaintiffs are aware of Mr. Wagman seeking leave to withdraw.
5. Attorney Geordie Duckler, who has served as local counsel to Plaintiffs in this action, will continue to represent Plaintiffs in this action. Mr. Duckler is aware of, and consents to Mr. Wagman seeking leave to withdraw.

WHEREFORE, Mr. Wagman and Riley Safer Holmes & Cancila LLP move the court to seek leave to withdraw as counsel to Plaintiffs in this action.

Dated: June 29, 2023

Respectfully submitted,

/s/ Bruce A. Wagman

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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on June 29, 2023, I caused the foregoing document to be filed using the Court's electronic filing system, which will send notice of this filing to all counsel of record.

/s/ Bruce A. Wagman

Bruce A. Wagman

Counsel for Plaintiffs